


**COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER QUALITY PROGRAMS
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Richmond, VA 23240-0009

SUBJECT: Guidance Memo No. 06-2001
Implementation of the 2006 Reissuance of the VPDES General Permit Regulation for Seafood Processing Facilities - VAG52

TO: Regional Directors

FROM: Ellen Gilinsky, Ph.D., Director
Division of Water Quality Programs 

DATE: March 8, 2006

COPIES: Water Permit Managers, Kyle Winter, Denise Mosca-PRO, Virginia Kelly-PRO, Michelle Hollis-TRO

Summary:

The purpose of this guidance is to provide updated information for implementing the Seafood Processing Facilities General Permit (VAG52) based on amendment of 9 VAC 25-115 and the 2006 reissuance of the general permit.

Electronic Copy:

An electronic copy of this guidance in PDF format is available for staff internally on DEQNET and for the general public on DEQ's website at: <http://www.deq.virginia.gov>

Contact information:

Please contact Mike Gregory, Office of Water Permit Programs, (804) 698-4065 or mbgregory@deq.virginia.gov if you have any questions about this guidance.

Disclaimer:

This document is provided as guidance and, as such, sets forth standard operating procedures for the agency. However, it does not mandate any particular method nor does it prohibit any particular method for the analysis of data, establishment of a wasteload allocation, or establishment of a permit limit. If alternative proposals are made, such proposals should be reviewed and accepted or denied based on their technical adequacy and compliance with appropriate laws and regulations.

Implementation of the 2006 Reissuance of the VPDES General Permit Regulation for Seafood Processing Facilities

Background

The General VPDES Permit for Seafood Processing Facilities, VAG 52, is established by regulation 9 VAC 25-115. It sets limitations and monitoring requirements for point source discharges of process water from seafood processing facilities. It also provides storm water permit coverage for seafood facilities that would otherwise require coverage under the industrial storm water general permit. This guidance replaces Guidance Memos 01-2018 and 96-005, previous implementation guidance for issuance of VAG52.

2006 Reissuance Changes

9 VAC 25-115 has been amended to reissue this general permit for another five-year period. The minor changes that have been made to the regulation and permit can be summarized briefly as follows:

- Minor editorial changes were made to the regulation language.
- The EPA re-opener was removed as it is considered unnecessary in a general permit.
- Special Condition #2 regarding chemical addition was edited to remove regional office approval ability in order to eliminate non-public noticed case decisions.
- A clarification was added to the "not limited elsewhere" first page of effluent limits.
- The storm water section was updated to be similar to the current language in the most current storm water industrial general permit.
- A section "C" was added to 9 VAC 25-115-30 stating a limitation on coverage by the general permit with regard to nutrient loadings, in order to avoid permitting nutrient loading in excess of the current seafood output (which is considered minor) and to avoid conflict with a nutrient watershed general permit that is under development.
- Section 6 of the registration statement, "Outfall Information" has been changed slightly and "Flow in GPD" and "Days per Year" have been added. The two new pieces of information allow estimation of annual flow which can be used for nutrient load approximations. More information on this is provided below.

The limits are the same, and the special conditions are the same except for editing, removing the EPA reopener and the resulting re-numbering. The amended regulation, permit reissuance fact sheet, registration statement and general permit can be found on DEQNET. The effective date of the reissued general permit is July 24, 2006. The expiration date will be July 23, 2011.

Registration for the 2006 Reissuance

Facilities that are currently covered by General Permit VAG52 must resubmit a registration statement in order to continue coverage under the reissued permit. The registration forms now posted on DEQNET should be sent out as soon as possible to the existing permit holders so they can reregister and avoid a lapse in coverage. At the latest, they should be received prior to the expiration date of the old permit. As before, the general permit should also be used to provide VPDES coverage to any qualified dischargers whose individual VPDES permits have expired or are expiring and to any new facilities that qualify. The fee is \$600.00. Coverage under the reissued general permit should not begin until the July 24, 2006 effective date of the new regulation.

Reviewing the Registration Statement

The basic procedures for implementation have not changed. Permit writers should send out the seafood general permit registration statement instead of standard application forms for facilities that might qualify for coverage. The

registration statement, just like any application, should be complete before the discharge is covered. Registration statements should be reviewed as the following paragraphs describe.

In the Applicant Information in Section 1, the facility owner is the person or entity that will get coverage under the permit. It means owner of the business, not necessarily owner of the building. It is expected that in most cases with this permit the owner and operator will be the same. The operator section only needs to be filled out if staff should contact someone at the plant other than the owner.

In Facility Information, Section 2, note that surface waters are defined in the registration statement instructions. Coverage should be denied if the discharge is into waters where other Board regulations or policies prohibit such discharges and coverage may be denied if the discharge is into endangered or threatened species waters. If there is an existing individual VPDES permit that is not expiring it will have to be revoked.

It is unlikely that the date of construction information will be needed on this third term of the general permit, but it is there in case an issue arises as to whether existing or new source effluent limits apply to a new discharge at an existing facility.

Regarding Section 4, the general permit regulation is specific about which SIC codes are eligible for coverage. This section also lets the permit writer know if the storm water pages apply to the discharger. Facilities with SIC codes 2091 and 2092 involve "industrial activity" with respect to the storm water regulations, and this general permit covers the storm water discharges as well as the process discharges. An example Storm Water Pollution Prevention Plan (and a similar plan with blanks) is provided as an attachment, and it should be sent to the permittees falling under the above SIC codes in order to assist them in developing a plan. For those facilities that do not fall under these two SIC codes, the letter transmitting the permit should indicate that Part II of the permit does not apply to them.

Sections 5 and 6 will indicate to the permit writer what kind of seafood processing operations occur at the facility and therefore which effluent limits pages need to be sent to the permittee. The applicable limits page and a DMR should be sent for each process. Some complications can arise when there are multiple processes with multiple outfalls (note applicant's answer to Section 8.B. of the registration statement), but in most cases the permittee will be able to pull a sample some time in a quarter that represents only one process. If this is not the case, OWPP can be contacted for assistance in determining sampling instructions to send to the permittee.

The regulation establishing this general permit has a new provision in it that says:

"Nutrient Discharges.

Annual mass loadings of total nitrogen in excess of 2300 pounds per year or of total phosphorus in excess of 300 pounds per year are not authorized by this general permit."

During the reissuance drafting nutrient sampling was conducted and data analysis was made to determine if facilities covered under the seafood general permit could contribute significantly to the Chesapeake Bay nutrient load. Specifically, seafood nutrients were compared to the equivalent nutrient load from a 40,000 gpd sewage treatment plant (a threshold reference in Chesapeake Bay nutrient legislation). It was determined that no facilities that are presently covered would approach this load level, and it is not anticipated that any new facilities will. The clause was added in the regulation to ensure that seafood general permit authorized discharges continue as an insignificant nutrient source.

The Section 6 Outfall Information table now requires daily flow information and operating days per year. The permit writer can use this information to estimate annual flow and screen the registration statement for facilities that might exceed the nutrient loading specified in the regulation. Based on typical nutrient concentrations, annual flows that may cause excessive nutrient loads are presented for some common seafood processes in the following table (copied from the fact sheet):

SEAFOOD PROCESS	ANNUAL DISCHARGE FLOW in MILLIONS OF GALLONS
Hand shucked Oyster	2.5
Hand picked or mechanized Crab	0.8
Hand shucked Clam	8.9
Fish Processing	2.3
Seafood packing, re-packing	4.6

If a registration statement is received with information that indicates flows higher than shown in the table, or if there is a question about nutrient loading from a different type of seafood process, contact OWPP for assistance in determining if coverage should be granted.

Section 7 provides the production information that is used to determine if facilities fall under the minimum production levels specified for existing sources in the conventional blue crab, shrimp, bottom fish, hand-shucked clam, hand-shucked oyster and catfish processing subcategories. If they fall below the specified level for a process, they should only be sent the A.1. Effluent limits page, "Seafood Processing Not Limited Elsewhere" for that process.

Section 9 asks for treatment information, but many facilities can meet the limits with no treatment. Note that this general permit does not authorize discharges of sewage. If sewage is being discharged, then an individual VPDES permit is required.

The regions will have to evaluate the response to Section 10 to determine if the chemicals being added to the water need to be limited or controlled in some way. If so, then the facility should not be covered by the general permit. Chemicals that are not identified on the registration statement should not be used.

Fees submitted for this permit should be handled according to the same procedures as used for individual permits.

Summary of Qualifications for General Permit Coverage

For the purpose of screening for qualification, facilities need to meet the following conditions:

1. The facility has submitted a complete registration statement (including fee).
2. The facility has the correct SIC code (2091, 2092, 5142 or 5146).
3. The facility is not a mechanized clam processing operation. (These were dropped from the permit.)
4. The facility has a point source discharge.
5. Discharge is not to prohibited waters.
6. There are no sewage discharges.
7. There are no chemicals that require special treatment.
8. The facility has not been required to obtain an individual permit.
9. The facility complies with the limits and special conditions of the permit.
10. The facility does not exceed nutrient loading as specified in the general permit regulation.

Antibacksliding

If the applicant previously held an individual permit, antibacksliding must be considered, but most of the individual permits issued in the past contained the same limits as this general permit, so this should not be an issue.

Antidegradation

Antidegradation was considered in the issuance of the general permit. It would be a factor in cases where coverage is requested for new or increased discharges that would increase the level of pollutants in-stream. It should be noted that switching back and forth between operations within the general permit coverage (such as changing from shucking oysters to picking crabs) is not considered as a new or increased discharge. If a case arises where some aspect of

antidegradation does appear to be an issue, it is recommended that OWPP be contacted for assistance. In general, the permit is protective of impaired waters.

Issuing Coverage under the General Permit

Once it is determined that the registration statement represents a facility that qualifies for coverage, the general permit pages can be prepared. The cover page, appropriate Part I effluent limits pages, special conditions, storm water section and boilerplate should be assembled with the general permit number for the facility entered on the cover page (other pages optional). It is not necessary to change the section numbers under Part I. A. that are currently numbered 1 through 27 on the effluent limits pages. Since these numbers are now associated with a specific seafood process, they might be used for a quick reference for which processing activities occur at the facility. Just arrange them in order. The outfall numbers must also be added at the end of the first sentence on each effluent limitations page. No other changes to the language of the general permit are authorized.

CEDS will automatically generate permit numbers for new registrations.

The general permit requires quarterly or annual monitoring and reporting. Therefore, DMRs are necessary for reporting and compliance tracking. A separate DMR is required for each process (oyster shucking, crab picking, etc.), to go along with the limits page for that process. The effluent limits apply to the total facility discharge, so multiple outfalls can be composited, then analyzed and reported on one DMR, or results from individually sampled and analyzed outfalls can be combined mathematically to show total load from the facility and this figure reported on one DMR. Either way, this should be done separately for each process for which effluent limits apply. All outfalls described in the registration statement for a process should be listed on the effluent limits page and on the DMR, so that there is indication in the permit of what outfalls require sampling. Also note all limits in the general permit are in terms of kg/kkg. Special Condition 5 describes the method for calculating this from kg/day.

Tracking of coverage under this general permit will be in CEDS. It is important that the database is kept updated with the list of permittees and contact information, their permit numbers, and which effluent limits pages they have.

Once the DMRs are ready, use the appropriate transmittal letter to transmit the permit, DMRs, and if storm water coverage is included, the example storm water pollution prevention plan, to the permittee and keep a copy for the regional file. It is not necessary to copy OWPP or EPA on individual coverage under a general permit. Note that the transmittal letter for coverage under a general permit does not contain the two paragraphs referencing the owner's right to appeal the decision to cover them under the permit. The transmittal should indicate where DMRs are to be sent.

DMR Tracking

DMRs are due on the tenth of January, April, July and October for quarterly monitoring, and on January 10 for yearly monitoring. Tracking of compliance with the limits and other requirements of the general permit should be done according to the Compliance Auditing System already established for individual VPDES permits. Reporting requirements for noncompliance, unusual or extraordinary discharges, etc. are the same as for an individual permit.

Storm Water Pollution Prevention Plan

The Storm Water Pollution Prevention Plan required by Part II of the permit for SIC codes 2091 and 2092 is developed by the permittee and maintained on site. The permittee is also required to inspect the site at least once per year to evaluate the effectiveness of their pollution prevention measures. There is no requirement for submittal to DEQ of the plan or the report on the annual inspections. If DEQ personnel make an inspection of a facility covered by the general permit, they should ask to see the pollution prevention plan and any evaluation reports that have been done. Failure to develop and follow the pollution prevention plan is a violation of the permit.

Facility Changes and Termination of Coverage

Any substantial new discharges or changes to a facility that could necessitate different permit pages, could change the nature or increase the quantity of pollutants discharged, or could cause noncompliance require submittal of a new registration statement within 30 days of the changes. Note that as discussed in the antidegradation section, switching

processes within the general permit is not considered as water quality impacting as far as changing or increasing quantity of pollutants, but it is necessary to make sure that the permittee has the correct pages from the general permit. If a registration statement is submitted to add a process that was not accounted for in the original registration statement, it should be evaluated as any registration statement. The "modification" procedure would be to send the new pages and DMRs, assuming the discharger still qualifies for the general permit.

If an owner requests termination of coverage under the general permit the regional office can terminate coverage under regional letterhead.

If there is a request for a change of ownership, then the new owner assumes the coverage under the general permit and the permit number does not change. A new registration statement is not necessary. Part III of the permit allows for automatic transfer of ownership if the 30-day prior notice and the required written agreement between the new and old owners are provided. The other change of ownership requirements and procedures from the Permit Regulation and VPDES Permit Manual that are common to all VPDES permits apply here as well. Any change of status should be noted in CEDS.

Attachments

1. Example Storm Water Pollution Prevention Plan
2. Storm Water Pollution Prevention Plan format with blank spaces
3. Example Registration Statement Transmittal Letter
4. Example Transmittal Letter for sending general permit pages, including storm water coverage
5. Example Transmittal Letter for sending general permit pages without storm water coverage

The amended regulation, general permit pages, fact sheet and registration statement with instructions are separate documents that can be found on DEQNET.

1. Example Storm Water Pollution Prevention Plan

General Permit No. VAG520001
ABC Seafood, Inc.
123 Main Street
Town, Virginia 23000

STORM WATER POLLUTION PREVENTION PLAN

This seafood processing facility is a small operation consisting of about twenty-six personnel during peak production times. It is located on a relatively small five-acre gravel and crushed shell tract of land near the end of Main Street in a generally undeveloped area. Areas adjacent to the facility are flat with only a gradual slope from east to west. The facility area is a rectangle with the length running east to west. Storm water drains from the property in sheet form in a westerly direction entering XYZ Creek which in turn flows into the Rappahannock River.

1. Pollution Prevention Control Team:

- a. Responsible Party: John Nemo, Owner
- b. Facility Manager: Richard Moby
- c. Foreman: Edward Teach

Please refer to Appendix A for duties and responsibilities of team members.

2. Description of possible pollution sources:

Sources at this site which could potentially add pollutants to storm water runoff discharges are vehicle parking and the industrial activities listed below and indicated on the site map.

a. Drainage:

- (1) Site map showing buildings and drainage is attached as Appendix B.
- (2) Industrial activities at this site that have a reasonable potential for adding significant amounts of pollutants to storm water are storage of oil in storage tanks, temporary storage of waste shells and crab picking wastes, and loading and unloading raw materials and finished product. Potential pollutants that might result from contamination of storm water from these sources or vehicle parking are petroleum products, solids, BOD and oil and grease. Contaminated runoff would flow in a westerly direction off the site. It would not be expected to be toxic.

b. Inventory of Exposed Hazardous or Toxic Materials:

There are no exposed toxic or hazardous materials at this site.

c. Spills and Leaks:

There is no known history of any spills or leaks of toxic or hazardous materials at this site.

d. Sampling:

Currently, no storm water sampling data is available. Future sampling results will be attached to Appendix D.

e. Risk Identification, Potential Pollution Sources:

There are no manufacturing or dust generating practices performed at this site. Only raw and final product (oysters in shells, packed oyster meat) are loaded, unloaded, or stored. Potential pollutants would be BOD, Solids, Oil and Grease.

3. Measures and Controls:

Several measures for controlling possible pollution problems are contained under the list of duties and responsibilities for Pollution Prevention Team Members. Other measures are outlined below.

a. Housekeeping:

Good housekeeping will be practiced which will require the maintenance, in a clean and orderly manner, of the entire facility area. All employees at the site will be alert to detect and correct or report possible pollution hazards.

b. Preventive Maintenance:

Maintenance of equipment at the site is scheduled and performed on a regular basis. Employees in contact with equipment which might cause a discharge of pollutants or process wastewater will, in the normal course of their duties, use, inspect, and maintain those items in a safe operating condition.

c. Spill Prevention and Response Procedures:

Before implementation of this plan, all Pollution Prevention Team Members will be given a "walk through" of the site identifying all areas of possible pollution, drainage areas, and will be shown methods of mitigating possible problems. The site has on hand sufficient quantities of materials to initiate a clean up effort by responsible personnel.

d. Inspections:

A record of inspections is attached as Appendix C. The inspection plan includes procedures to ensure follow up inspections are conducted to address problems uncovered and reported in previous inspections.

e. Employee Training:

Each employee at the site is familiar with good housekeeping, maintenance, and inspection procedures. Each Pollution Prevention Team Member will receive additional training in their individual assigned function. A refresher meeting and walk through exercise will be conducted each year.

f. Record Keeping and Internal Reporting Procedures:

Written descriptions of incidents such as leaks, spills, or other discharges of pollutants, and other pertinent data are included in Appendix D. Records of other activities relating to this plan are also incorporated into Appendix D.

g. Sediment and Erosion Control:

The surface of the property is covered with a mixture of gravel and crushed sea shells. This mixture is subject to little or no erosion.

h. Management of Runoff:

Employees check the site daily for potential storm water pollutants. Our goal is to ensure that no pollutants are exposed to storm water runoff on the facility's property.

4. Comprehensive Site Compliance Evaluation:

The owner of the seafood processing facility will designate an employee of the company to perform a comprehensive site evaluation once a year to evaluate storm water pollution sources, compliance with the Storm Water

Pollution Prevention Plan, the effectiveness of the plan and any necessary revisions to the plan. A written report will describe the inspection, summarize the results of the inspection and describe any revisions to the plan that were found to be necessary. It will identify any observed noncompliance with the plan, or if none are identified, will include certification of compliance with the plan, signed in accordance with Part III.K. of the permit. The inspection report, a record of corrections of reported problems, and the certification are entered in Appendix C of this plan.

5. Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons or person directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines or imprisonment for knowing violations.

Signed: _____

Owner
ABC Seafood, Inc.

Date: _____

Appendices:

- A Pollution Prevention Team Duties
- B Site Plan
- C Record of Inspections
- D Training and Reports

Appendix A

Duties and Responsibilities of the Site Pollution Prevention Team.

1. Responsible Party:

Ensure that plan is developed and implemented.

Ensures team members are trained and aware of their responsibilities.

Ensures team members are aware of and trained if the plan is revised.

Conduct employee training and ensure that all employees are aware of measures to prevent pollution of storm water including good housekeeping practices and equipment maintenance and are aware of the necessity to report actual or potential pollution of storm water.

Maintains records and files inspection and other reports.

2. Facility Manager:

Carries out instructions from responsible party.

Coordinates activities of other team members.

Performs periodic inspections of the site, takes action to correct defects, schedules team member training.

Conducts yearly Comprehensive Site Compliance Evaluation.

Writes reports on inspections, remedial actions and comprehensive site evaluation for submittal to responsible party.

3. Foreman:

Inspects and maintains equipment which poses a possibility of a pollutant discharge.

Directs and performs housekeeping in and around the processing building(s).

Insert hardcopy of map here as Appendix B...

Appendix C

RECORD OF INSPECTIONS:

Comprehensive Site Evaluation:

Once annually the manager of this seafood processing facility will be scheduled to perform a comprehensive site evaluation and render a written report, to be filed in this appendix.

Date: _____2006 _____2009

Date: _____2007 _____2010

Date: _____2008 _____2011

Other inspections:

The facility manager and foreman will inspect facilities twice a year. A record of the results of inspections will be placed in this appendix. Items to be corrected will be reported immediately to the responsible party for further action.

The foreman will maintain and inspect all equipment. Only those items needing repair need be entered into the file after repairs are completed.

Attachments:

Annual certification of compliance with Storm Water pollution Prevention Plan

Inspection Reports

***Example Certification of Compliance with Storm Water
Pollution Prevention Plan***

(When Comprehensive Site Evaluation shows facility is in compliance with plan, sign and attach to Appendix C with inspection reports)

General Permit No. VAG52
ABC Seafood, Inc.
123 Main Street
Town, Virginia 23000

CERTIFICATION

I certify that during 2001 I conducted inspections and a comprehensive site evaluation of the seafood processing facility. I thoroughly inspected the property and observed conditions during a rainfall. I observed where storm water entered the site and where it crossed and discharged from the site. My conclusions are that the site is in compliance with the storm water pollution prevention plan developed for this facility.

I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or person directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines or imprisonment for knowingly violating these provisions.

Signed: _____

ABC Seafood, Inc.
Owner

Date: _____

Appendix D

RECORDS OF TRAINING AND REPORTS:

Each Team member currently has received training in recognition of hazards or potential hazards for contamination of storm water.

Any new team members will receive similar training and a record of such training entered into the record.

Each current team member has been given a "walk-through" tour of the site at which time possible pollutant sources were described and pointed out. Proper maintenance for all equipment was discussed.

Records of future training will be entered into this appendix.

Maintenance records pertaining to possible pollution sources will be entered into this record, as well as records of leaks, spills or other pollutant discharges, and any results of storm water sampling.

2. Storm Water Pollution Prevention Plan format with blank spaces

General Permit No. VAG52_____

Facility Name and Address:

STORM WATER POLLUTION PREVENTION PLAN

DESCRIPTION OF SEAFOOD PROCESSING FACILITY:

DESCRIPTION OF PROPERTY AND STORM WATER DRAINAGE:

1. Pollution Prevention Control Team:

a. Responsible Party:_____

b. Title and names of other team members:

Please refer to Appendix A for duties and responsibilities of team members.

2. Description of possible pollution sources:

a. Drainage:

(1) Site map showing buildings and drainage is attached as Appendix B.

(2) Description of any industrial activities at site that could potentially add pollutants to storm water:

a. Inventory of Exposed Hazardous or Toxic Materials:

c. History of any Spills and Leaks at site:

d. Storm water sampling data results if any:

e. Risk Identification, Potential Pollution Sources:

Indicate any manufacturing, dust generating practices, loading and unloading or storage at the site and what potential pollutants they could add to storm water:

3. Measures and Controls:

a. Housekeeping practices at site:

b. Preventive Maintenance at site:

c. Spill Prevention and Response Procedures:

d. Inspections:

A record of inspections is attached as Appendix C.

e. Employee Training Description:

f. Record Keeping and Internal Reporting Procedures:

Written descriptions of incidents such as leaks, spills, or other discharges of pollutants, and other pertinent data are included in Appendix D. Records of other activities relating to this plan are also incorporated into Appendix D.

g. Sediment and Erosion Control Measures:

h. Runoff Management Procedures:

4. Comprehensive Site Compliance Evaluation Description:

The inspection report, a record of reported problems and corrections, and certification of compliance with the plan (if in compliance) are attached to Appendix C.

5. Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons or person directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines or imprisonment for knowing violations.

Signed: _____

Title: _____

Date: _____

Appendices:

- A Pollution Prevention Time Duties
- B Site Plan
- C Record of Inspections
- D Training and Reports

Appendix A

Duties and Responsibilities of the Site Pollution Prevention Team.

1. Responsible Party:

Duties:

2.

3.

Attachment B
Attach Site Map

Appendix C

RECORD OF INSPECTIONS:

Comprehensive Site Evaluations:

Date: _____ 2006 _____ 2009

Date: _____ 2007 _____ 2010

Date: _____ 2008 _____ 2011

Other inspections:

Attachments:

Annual certification of compliance with Storm Water pollution Prevention Plan

Inspection Reports

(When Comprehensive Site Evaluation shows facility is in compliance with plan, sign and attach to Appendix C with inspection reports)

Name and Address of Facility:

CERTIFICATION

I certify that during the year _____ I conducted inspections and a comprehensive site evaluation of the seafood processing facility. I thoroughly inspected the property and observed conditions during a rainfall. I observed where storm water entered the site and where it crossed and discharged from the site. My conclusions are that the site is in compliance with the storm water pollution prevention plan developed for this facility.

I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or person directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines or imprisonment for knowingly violating these provisions.

Signed: _____

Title: _____

Date: _____

Appendix D

RECORDS OF TRAINING AND REPORTS:

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper has a slight shadow on the right side, suggesting it's resting on a surface.

3. Example Transmittal Letter - Seafood Processing Facility General Permit Registration Statement

Regional Letterhead

Facility Name

Address

ATTN: John Contact

RE: Registration for the General VPDES Permit for Seafood Processing Facilities

Dear Mr. Contact:

General VPDES permit VAG52 for Seafood Processing Facilities has been reissued and will be effective July 24, 2006. This general permit provides VPDES permit coverage to discharges from all qualified seafood processing facilities that submit a registration statement and are approved for coverage. Note that for those facilities that require permitting of their storm water discharges, this general permit will cover those discharges as well.

Current general permit holders must re-register in order to continue coverage under the reissued general permit. Individual VPDES permit holders or other seafood processing facility owners must complete and submit the enclosed registration statement if they wish to be covered under this general permit instead of an individual permit. The registration must be submitted within *[insert correct time period]*. If your facility qualifies for the general permit, it is recommended that you obtain coverage in order to simplify requirements for having your process wastewater or storm water discharges permitted.

Instructions for completing the registration form and an application fee form are included in this package. The application fee for this general permit is \$600.00. Please follow the instructions on the fee form for submitting this fee.

If you have any questions, please do not hesitate to contact us.

Sincerely,

Permit Writer

4. **Example Transmittal Letter - Seafood Processing Facility General Permit
SIC CODES 2091 and 2092 (Storm water pages apply)**

Regional Letterhead

Facility Name
Address

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ATTN: John Contact

RE: Coverage under the General VPDES Permit for Seafood Processing Facilities
VAG52_____

Dear Permittee:

We have reviewed your Registration Statement received on _____, and determined that this seafood processing activity is covered under the referenced general VPDES permit. The effective date of your coverage under this general permit is the date of this letter. The enclosed copy of the general permit contains the applicable effluent limitations, monitoring requirements and other conditions of coverage.

In accordance with the permit you are required to submit discharge monitoring reports (DMR) to:

Regional Office Address

The reporting form[s] is [are] included with the permit. You will be responsible for obtaining additional copies of the reporting form. A separate DMR is to be completed for each seafood processing activity at your plant. The sampling and reporting are on a quarterly [yearly] basis with the DMRs due on the tenth of January, April, July and October [January 10 *for yearly*] of each year.

Also note that this general permit constitutes coverage of your storm water discharges as required by the storm water regulations for your industry. Part II of the general permit pertains to these storm water discharges. This part of the permit requires that you develop a Storm Water Pollution Prevention Plan. Please see this section for details. To assist you in preparing the plan, an example plan and format is included with this package for you to use as a guide if desired.

If you plan to add any processing activities not reported on the original registration statement, add discharges, construct new facilities or add to the present facilities, please submit to this office a new registration statement within 30 days of the planned changes. If the plant ownership changes or you wish to terminate coverage under this general permit, please notify this office.

The general permit will expire on July 23, 2011. The conditions of the permit require that you submit a new registration statement before that date if you wish continued coverage under the general permit.

If you have any questions, please do not hesitate to contact us.

Sincerely,

5. **Example Transmittal Letter - Seafood Processing Facility General Permit
SIC CODES 5142 and 5146 (Storm water pages do not apply)**

Regional Letterhead

Facility Name
Address

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ATTN: John Contact

RE: Coverage under the General VPDES Permit for Seafood Processing Facilities
VAG52_____

Dear Permittee:

We have reviewed your Registration Statement received on _____, and determined that this seafood processing activity is covered under the referenced general VPDES permit. The effective date of your coverage under this general permit is the date of this letter. The enclosed copy of the general permit contains the effluent limitations, monitoring requirements and other conditions of coverage.

As your facility is not subject to storm water regulation, please note that Section II of the general permit enclosed does not apply to your facility.

In accordance with the permit you are required to submit discharge monitoring reports (DMR) to:

Regional Office Address

The reporting form[s] is [are] included with the permit. You will be responsible for obtaining additional copies of the reporting form. A separate DMR is to be completed for each seafood processing activity at your plant. The sampling and reporting are on a quarterly [yearly] basis with the DMRs due on the tenth of January, April, July and October [January 10 *for yearly*] of each year.

If you plan to add any processing activities not reported on the original registration statement, add discharges, construct new facilities or add on to present facilities, please submit to this office a new registration statement within 30 days of the planned changes. If the plant ownership changes or you wish to terminate coverage under this general permit, please notify this office.

The general permit will expire on July 23, 2011. The conditions of the permit require that you submit a new registration statement before that date if you wish continued coverage under the general permit.

If you have any questions, please do not hesitate to contact us.

Sincerely,